General Aviation Pilot Licensing & Training Simplification – Phase 1: Strategic Direction

A consultation

CAP 2335

Published by the Civil Aviation Authority, 2022

Civil Aviation Authority
Aviation House
Beehive Ring Road
Crawley
West Sussex
RH6 0YR

First published October 2022
Second edition

Please reply to this consultation via our website: https://consultations.caa.co.uk by **Friday 16 December 2022**.

Please direct enquiries regarding the content of this publication to: ga.consultations@caa.co.uk

The latest version of this document is available in electronic format at: www.caa.co.uk

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Summary

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1. We have decided to undertake a detailed project to explore consolidating and simplifying the current general aviation pilot licensing and training regulation. Following the UK's departure from the EU, we would like to consolidate as much as legally possible, the general aviation licence regulations appropriate for the full range of aircraft used for non-commercial operations.

2. This takes forward a request from the community to our 2020 consultation on opportunities for general aviation regulation post-EU exit. We join many of the respondents in questioning the complexity of the current suite of general aviation licences and ratings.

3. We think the community would be better served by an overhaul of the current system in favour of a more straightforward and integrated set of licences that allow easier progression should the holder wish to do so.

4. This consultation is the first of a multi-phase process, and explores the strategic steps that are required across five major themes:

    a) Creating a single set of Private Pilot Licences (PPL) for aeroplanes and helicopters that comply with International Civil Aviation Organisation (ICAO) standards.

    b) Creating a single set of aeroplane and helicopter pilot licences that do not comply with international standards. Such 'sub-ICAO' licences are designed for flight in UK airspace only and subject to certain limitations.

    c) Proposing to integrate the syllabuses of the sub-ICAO licences with the internationally recognised PPL, for each aircraft category. We think the sub-ICAO licences could be termed 'Private Pilot Licence (Light)' for aeroplanes or helicopters, along with operational limitations borrowed from the current microlight aeroplane community. Integrating the syllabus would allow operational limitations as well as sub-ICAO status to be progressively removed from a licence upon further training, should the holder wish.

    d) Developing an approach for sailplanes and balloons, including arriving at an appropriate licence for commercial passenger-carrying ballooning operations which are a significant element of UK ballooning.

    e) Developing an approach to preserve the validity of existing licences under any new system we create, while minimising undue disruption and costs on users, flying schools and ourselves.

5. With the exception of private pilot flight instruction, and commercial ballooning, licences, and ratings for other types of commercial operations are outside the scope of this project. General aviation was meant to be the focus of this project, and will be confined to this area at this time.

Responding to this consultation and next steps

6. This consultation closes on **Friday 16 December 2022**. Please submit responses via our website: https://consultations.caa.co.uk.

7. The outcome of this consultation will help to shape the next phase of this project which will explore further details on individual licences, ratings and certificates, as discussed in more detail in Chapter 2 below.

Chapter 1

Scope & Background

1.1 A request from the community to simplify and rationalise General Aviation (GA) pilot licensing featured prominently in the responses received to a consultation we undertook on opportunities to improve aviation regulation having left the European Union.[1] We have decided to undertake this strategic project to look at the licensing and training landscape focusing on the following:

- Consolidating the two-tiered regulatory structure for general aviation pilot licensing that is currently in place reflecting the former European system;[2] and 'national' regulations set out in the Air Navigation Order 2016 (ANO)[3] to create a simpler set of regulations for the UK GA community.
- Maintaining compliance with our obligations under the Chicago Convention, in respect of international standards and recommended practices for Personnel Licensing which we are obliged to follow.
- Identifying and reviewing areas where multiple licences and ratings cover a relatively narrow range of aircraft.
- Exploring simplifying pathways between licences while maintaining safety.

1.2 We aim to create a simpler set of regulations for the UK GA community. This project will be complex, covering most of the flying within GA subject to the scope limitations we will describe in more detail below. This consultation is the first of a multi-phase process, exploring the strategic steps that are required across four major themes:

a) Creating a single set of ICAO-compliant Private Pilot Licences (PPL) for aeroplanes and helicopters.

b) Creating a single set of aeroplane and helicopter pilot licences that do not meet the ICAO standards and recommended practices. Such 'Sub-ICAO'

[1] See CAP1985, UK General Aviation Opportunities after leaving EASA – a consultation, 10 Nov 2020.

[2] By 'European system' we mean the suite of European Union regulations comprising the Basic Regulation and its various implementing regulations. References to Basic Regulation in this consultation refer to UK Regulation (EU) 2018/1139, which was retained and amended into UK law by The Aviation Safety (Amendment etc) (EU exit) Regulations 2019. These regulations can be downloaded for reference only from the CAA website. For a legally definitive version, please see legislation.gov.uk website as Regulation (EU) 2018/1139.

[3] References to Air Navigation Order (ANO) in this consultation refer to the Air Navigation Order 2016 (SI 2016 no.765, as amended) which can be downloaded for reference only from the CAA website. For the legally definitive version, please see the latest ANO on the legislation.gov.uk website.

licences are designed for flight in UK airspace only and are subject to certain limitations.

c) Developing an approach for sailplanes and balloons considering recent developments in the EASA regulations in these areas shortly before the UK departed from the EU. Of paramount issue here is arriving at an appropriate licence for commercial passenger-carrying ballooning operations which are a significant element of UK ballooning.

d) Developing an approach to preserve the validity of existing licences under any new system we create, while minimising undue disruption and costs on users, flying schools and the CAA.

Scope

1.3 The scope of this project is confined to regulated private pilots, instructors/examiners of private pilots, and commercial ballooning. We will be looking at licensing, ratings and certificates covering the full range of GA aircraft categories: aeroplanes, microlights, helicopters, sailplanes, touring motor gliders/self-launching motor gliders, gyroplanes, and balloons.

1.4 This project will *not* cover the following areas:

a) Commercial operations other than private pilot instruction and those related to ballooning. Pilot licences allowing commercial operations in aeroplanes or helicopters, including public transport and commercial air transport, as well as integrated flight training with the express purpose of training from no previous experience to air transport licences are all outside the scope of this project.

b) Private operations in complex aeroplanes and helicopters. Although operations in, for example, corporate aviation is technically part of the international general aviation definition,[4] the specific characteristics and needs of the markets in which those aircraft operate mean that we regulate them separately.

c) Ratings and rating exemptions for historic/ex-military aircraft, as well as display pilot qualifications.

[4] ICAO Annex 6 Operation of Aircraft, Part II – International General Aviation – Aeroplanes (Tenth Edition, July 2018) Chapter 1.1 defines 'a general aviation operation' as a civilian aircraft operation other than a commercial air transport or an aerial work operation'. And 'aerial work' is defined as 'an aircraft operation in which an aircraft is used for specialised services such as agriculture, construction, photography, surveying, observation and patrol, search and rescue, aerial advertisement, etc.'

d) Unregulated activities to operate Non-Part-21 gliders such as unregulated sailplanes and Self-Propelled Hang Gliders (also known as 'paramotors' or 'powered paragliders'). Finally,

e) Medical Certification and the Pilot Medical Declaration, although linked to licensing are not considered in this initial review. A separate review is addressing these areas.

1.5 We have no plans in this project to amend the legal basis of the aircraft themselves. The retained European regulations are rooted in the UK Basic Regulation which is primary legislation, and aircraft within its scope (known as 'Part-21 aircraft') will remain so, as will be those in the scope of the ANO ('Non-Part-21 aircraft').

Drivers for undertaking this project

1.6 The following are the main drivers of this project:

a) Consolidating where possible the existing two-tiered regulatory structure

1.7 The GA pilot licensing regulatory structure currently consists of two regimes:

a) Licences issued in accordance with the ANO, specifically Schedule 8; and

b) Licences issued in accordance with regulations that were retained into UK law under the European Union (Withdrawal) Act,

i. UK Part-FCL (Flight Crew Licensing) of the UK Aircrew Regulation;[5]

ii. UK Part-BFCL (Balloon Flight Crew Licensing) of the UK Balloons Air Operations & Licensing Regulation;[6] and

iii. UK Part-SFCL (Sailplane Flight Crew Licensing) of the UK Sailplane Air Operations & Licensing Regulations.[7]

1.8 These two regimes are in place to reflect the structure that existed when we were part of the EASA system, covering licence privileges to fly Non-Part-21 and Part-21 aircraft respectively.

1.9 This may be sufficient for existing pilots who know their flying needs and have little intention to change; however it does create challenges for pilots who might be less sure about their future flying needs. Although progression pathways do exist within the regulations, these could be improved and made simpler.

[5] See UK Reg (EU) No.1178/2011 (the UK Aircrew Regulation)

[6] See UK Reg (EU) No.2018/395 (the UK Balloons Regulation)

[7] See UK Reg (EU) No.2018/1976 (the UK Sailplanes Regulation)

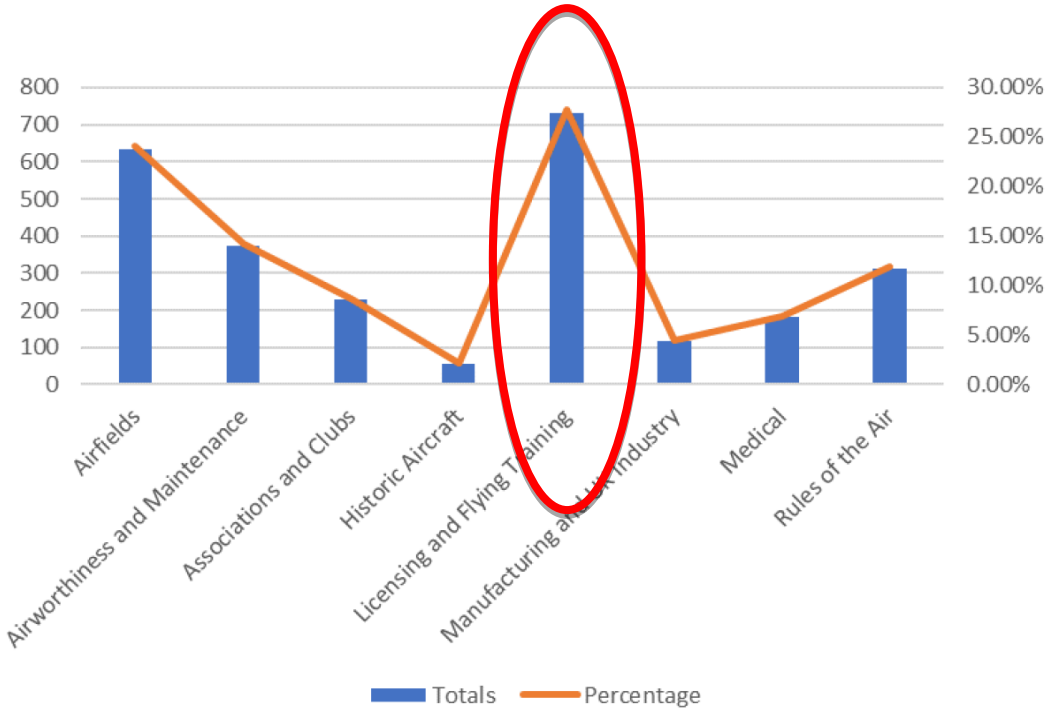
1.10 Finally, having two different regulatory regimes impacts the efficiency and effectiveness of administering the licensing function, not just for individuals and flying schools but on us at the CAA.

b) Mandate from the GA community

1.11 Responses we received to our GA opportunities post-EU exit consultation were summarised in our CAP2146 comment response document published in April 2021.[8] They indicated a clear and indisputable mandate from the GA community for this project.

1.12 That consultation was undertaken over six weeks in Autumn 2020, and was widely promoted through a direct email, our Skywise platform as well as through the CAA social media accounts. We received 974 responses through our online consultation platform as well as direct responses through the main flying associations. We also noted that 64% of all the respondents were qualified pilots, and 17% were certificated flying instructors/examiners. Just 26 respondents described themselves as not part of the GA community.

Figure 1: Overall Responses to CAP1985 by theme

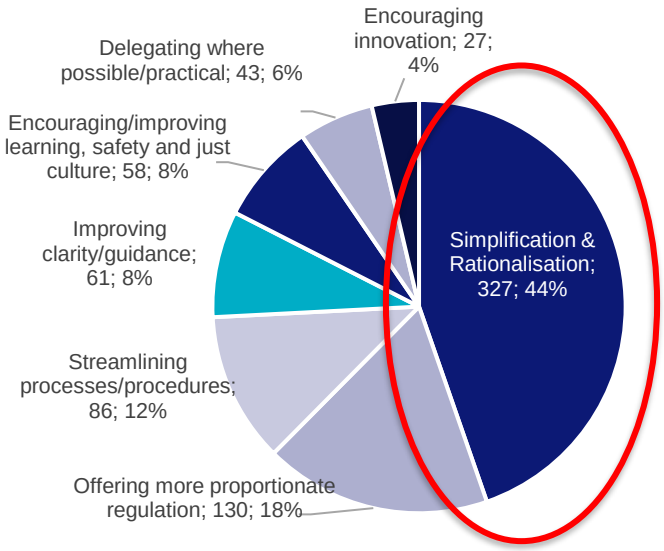


1.13 Respondents to CAP1985 were given a list of the top themes that they thought we should prioritise for regulatory review and were invited to give their top choices. As indicated in Figure 1, licensing and flying training was by far the most popular choice of all by a significant margin with 28% overall choosing this theme over such other topics as airfields and airworthiness/maintenance.

[8] See CAP2146: UK General Aviation Opportunities after leaving EASA: consultation response document, 19 Apr 2021.

1.14 When then asked which areas of flight crew licensing should be examined (Figure 2). Simplification and rationalisation of licensing was the most popular choice, though other themes such as 'offering more proportionate regulation' also figured strongly.

Figure 2: Licensing Topics to be Reviewed



1.15 We examined in further detail the verbatim comments left by those who chose the simplification option. Although, there was no clear consensus of suggestions as to how best to simplify and rationalise, we noted the following recurring themes:

- Too many variations of licences/ratings among too few aircraft categories
- Requirements perceived as more onerous than necessary
- Regulatory information too complex and inaccessible
- Specific mentions about instructor requirements being disproportionate

1.16 In summary, while there is limited consensus on *how* we should simplify GA pilot licensing, we interpret these findings as a clear message from the community that this project is not just an exercise to consolidate two regulatory regimes post-EU exit. Rather we think this presented an indisputable mandate for us to undertake this once-in-a-generation overhaul of GA pilot licensing to simplify the options and make the requirements more proportionate to the UK's needs.

c) Addressing in-built complexities in regulations and communications

1.17 We also see this as a chance to review not just the requirements themselves but also how we present and communicate these regulations to the community. We get recurring messages in not just the consultation response but also more routinely that how we communicate our rules is overly complex. The volume of pilot licensing clarification queries we receive—whether they are through our

enquiries system, via the training organisations, or directly from people visiting us at our GA stand at face-to-face events—suggest that users are exhausting considerable effort locating and understanding our requirements. While much of that is about communications and publishing, we still think there are some more structural issues that need to be looked at, not just how we communicate/promulgate them.

Consultation Question 1

To what extent do you agree that the GA pilot licensing system needs simplification?

- Strongly agree
- Agree
- Disagree
- Disagree strongly
- No view/don't know

Do you have any comments about this?

Consultation Question 2

To what extent do you agree with our approach that this exercise should go beyond just consolidating the current two-tiered regulatory system?

- Strongly agree
- Agree
- Disagree
- Disagree strongly
- No view/don't know

Do you have any comments about this?

Consultation Question 3

Please select two statements that best describes your view of the current overall GA pilot licensing regulation.

- The current regulations are unduly complex and review, consolidation, and simplification are strongly needed.
- The regulations are complex. Recent legislative changes have addressed this, BUT further review/simplification is still needed.
- The regulations are complex. Recent legislative changes have addressed this AND no further review/simplification is needed.
- The regulations are not unduly complex. No major changes are needed.
- The regulations are complex, but they have been changing a lot in the last few years, so the Authority should wait a while longer before making new changes.
- None of these. My view is:_____
- No view/don't know

Chapter 2

How we are approaching this project

2.1 Having established that we have regulatory drivers as well as a mandate from the community to progress this project, this chapter describes how we plan to undertake it and some of our operating principles.

Phased project approach

2.2 Even with its scope limited to GA and not commercial air transport, the project is still very complex, with a range of licences, ratings and certificates cutting across the ANO and UK Part-FCL regimes and are themselves overlaid by the ICAO and Sub-ICAO structure. This project will also take a considerable amount of time, possibly two years or more before rulemaking changes could come into force. There will also be an implementation period built into the rule making process to ensure the community has sufficient time to act on the changes.

2.3 We have therefore opted for a phased approach, with each phase having its own consultation and recommendations for next steps.

a) **Phase 1: Scope for simplifying the licensing architecture:** the high-level issues including the implications for consolidating ANO and the retained EASA regulations, compliance with ICAO standards and recommended practices, and the distinction between general aviation and commercial flight training. Understanding these strategic issues would be essential before deeper analysis of licences and ratings.

b) **Phase 2: Licenses, ratings, and certificates:** once the strategic licensing architecture is agreed, then it would be possible to focus on licences, ratings, and certificates themselves across all the aircraft categories in scope. We will look at including privileges, training, exams, costs, and cross-compatibility where this is relevant, and we will be liaising throughout with our legal colleagues and with the Department for Transport (DfT) on legal feasibility (see especially chapter 3 below). It will be necessary to further break this down to pilot and instructor components. This will culminate in a series of policy proposals from which we could develop rulemaking.

c) **Phase 3: Rulemaking, transparency, and simplicity:** once we have identified the policy proposals for GA pilot licensing and training regulation, we will then turn to the most efficient rulemaking to deliver that. This phase will also explore how these new regulations should be best communicated, taking in best practices in other jurisdictions.

2.4 This Phase 1 consultation covering strategic direction will look at the following topics:

- Consolidating the two regulatory regimes comprising the flight crew licensing provisions in the ANO and the flight crew licensing parts of the retained regulations.
- Streamlining the Private Pilot Licences for aeroplanes and helicopters to prioritise compliance with the ICAO standards and recommended practices over the former EASA regulations without any degradation in safety.
- Understanding how the suite of sub-ICAO helicopter and especially aeroplane pilot licences can be consolidated for all non-Part 21 and Part-21 types to form one each for aeroplanes and helicopters.
- Developing an approach for sailplanes and balloons considering recent retained regulations, the implementation of which has currently been delayed allowing time for this review. There is still a pressing urgency for those two communities to implement these regulations by December 2023 and therefore we will aim to prioritise decisions in these areas once we arrive at the outcome to the questions in Chapters 7 and 8 of this consultation.
- Developing an appropriate method of accepting licences issued under the existing licensing regulatory regimes within any new framework created by this project.

Operating principles

2.5 In this section we describe the operating principles that govern our approach to this project. As with all our policy making endeavours, they are in keeping with our five Regulatory Principles which are summarised on the CAA website.[9]

a) Understanding and addressing risk

2.6 While this project focuses on consolidation of existing GA pilot licensing regulations as well as simplification and rationalisation, we will not undertake any measures that risk compromising flight safety. Phase two of this project will involve a detailed review of individual licences, ratings, and certificates, and it will involve reviewing existing regulation with a view to streamlining requirements where possible but only after careful assessment of the safety implications stemming from those changes.

[9] See CAP2185 Our Regulatory Principles, 10 June 2021.

b) Engaging proactively and transparently

2.7 This project will have a wide effect across the GA community. As with every policy making process in the CAA, we will consult after every phase of the project, and summarise the findings via a Comment Response Document.

2.8 To assist us with this work, we have collaborated using a small working group comprising subject matter experts from the various aircraft categories in the scope of this project. Members include pilots, students, instructors, examiners, and policy experts.

2.9 This working group will evolve through the course of this project. Phase 1 has involved high level participation by subject matter experts, while subsequent phases will widen participation and involve sub-groups tasked to focus on aircraft category-specific issues.

c) Delivering unique value

2.10 This principle commits us to take a proactive approach to regulation, facilitating and nurturing innovation and encouraging others to do the same.

2.11 A key priority as described above is our status as a signatory to the Chicago Convention and therefore maintaining compliance with standards and recommended practices, namely Annex 1 on Personnel Licensing. Although we could conceivably file for differences against those standards and recommended practices, we want to avoid this where possible. In relation to the PPL, we will review any existing requirements that go beyond Annex 1 and determine whether these are necessary to achieve the existing safety standards for UK GA. Chapter 3 of this consultation will detail our thinking in this area.

d) Acting proportionately/avoiding gold-plating

2.12 This principle commits us to explore different ways of achieving desired outcomes, regulating only where we must. The whole purpose of this project is to ensure that GA pilot licences are as simple and as straightforward as they need to be to achieve an acceptable safety standard.

2.13 Flight crew licensing involves the reconciliation of privileges to operate a particular aircraft against the combination of competency, experience, and medical fitness, and each of those variables must be proportionate to deliver a reasonable level of safety without being unduly onerous. In this project, we aim to review the requirements to ensure they are appropriate for the UK GA community, and do not constitute additional burdens.

e) Acting on our combined insight

2.14 This project is also part of our wider GA Change Programme and as such we aim to adhere as much as practically possible to our top-level principles for better GA regulation. Proportionality is one of those principles, the others being:

- Deregulate where we can
- Delegate where appropriate
- Help to create a vibrant and dynamic GA sector for the UK.

2.15 **Deregulation:** as part of Phase 2 of this project when we look in more detail at specific licences, ratings and certificates and determine any scope for reducing regulations in particular areas.

2.16 **Delegation:** is a key component of some aspects of flight crew licensing. Presently several GA associations make recommendations to us to issue licences, ratings or certificates; and one association issues those on our behalf. Our aim to continue this approach must be balanced by our regulatory obligations, including that ICAO-compliant licences can only be issued by us as an ICAO contracting state licensing authority.

2.17 **Helping to create a vibrant, dynamic and more accessible GA sector:** we see this endeavour as an excellent opportunity to improve the accessibility of GA to a more diverse community. Not just existing pilots looking to continue their flying careers, but also for prospective ones who might otherwise see obtaining a pilot licence as too complex. For example, currently the ICAO compliant PPL(A) is the most popular route for prospective aeroplane pilots. Most will obtain a Single Engine Piston Class Rating that allows them, subject to additional training requirements, to fly aeroplanes weighing up to 5,700kg[10] and is recognised in any ICAO Contracting State. However, many of these pilots will only ever fly on 2-4 seat aeroplanes weighing up to 2,000kg on private operations in day-visual conditions over the UK only. Is such an ICAO-compliant licence with such a high weight scope really the most cost-effective training for them?

2.18 There should also be better pathways to convert from one licence to another should their flying career progress. We think creating much simpler routes to flying light aircraft might present an opportunity to open GA flying to a range of new pilots. Not only will this encourage more diversity in GA, but it would also reinvigorate this sector and aviation more broadly as GA is often the gateway to a range of different pursuits and careers in aviation.

[10] References to aircraft weights in this consultation refer to Maximum Take-Off Mass.

Chapter 3

Legal basis of GA licensing regulation

3.1 Before delving into the substantive suggestions around consolidating specific licence categories, this paper now looks at which legal regime of regulation the GA pilot licences should be housed.

3.2 As explained in Chapter 1, when we were part of the European system, certain aircraft were left to national regulation. This led to two regulatory regimes with differing treatment of EASA ('Part-21') aircraft and national ('Non-Part-21') aircraft. These two regimes still exist post-EU exit, (as do the 'Part-21' and 'Non-Part-21' labels), but the retained regulations governing the former category are now wholly and completely overseen by the UK as opposed to the CAA being a competent authority within the EASA framework.

Consideration: avoiding needing to amend the UK Basic Regulation

3.3 In relation to GA pilot licensing, in addition to the driver described in Chapter 2 of creating a single set of pilot licences that apply to Part-21 and Non-Part-21 aircraft, we have the important aim to avoid amendment to the Basic Regulation.

3.4 The retained UK Basic Regulation contains features that are designed to distinguish aircraft within its scope from Non-Part-21 aircraft, thereby limiting our ability to consolidate licences. Therefore creating any single licensing regulation governing both groups of aircraft would require amending the Basic Regulation.

3.5 As the UK Basic Regulation is primary legislation, amending it is significantly more complex and time consuming than amending secondary legislation such as the ANO or the Aircrew Regulation.

3.6 One alternative is waiting for the UK to enact legislation replacing the Basic Regulation. However even at time of writing, this is a rapidly changing situation. Our view is that pressing ahead with this project is a better use of time and would help us to proactively arrive at suitable GA licensing regulations that are aligned with such wider legislation going forward.

Our current thinking: issuing single licences with ANO and Part-FCL components

3.7 We have been working closely with colleagues at the Department for Transport to arrive at an optimum approach that delivers on the project objectives within these legal constraints.

3.8 We propose to issue single pilot licences for each aircraft category with both Part-FCL and ANO components, thereby allowing holders to exercise their

privileges in G-registered Part-21 and Non-Part-21 aircraft respectively, within the weight and operational limitations of the licence category. So from the perspective of the holder of that licence, it would be a single licence valid for both groups of aircraft, whether they have a national Permit-to-Fly or a Part-21 Certificate of Airworthiness.

3.9 While Phase 2 of this project will look at the detail of this, broadly we would achieve this by aligning the requirements for licences, ratings and certificates across the ANO and Part-FCL regimes. This will be especially relevant for the Sub-ICAO licences, compared to the ICAO-compliant PPL which is predominantly grounded in Part-FCL.[11] Chapter 5 below on our proposals for the Sub-ICAO licences describes in further detail how, for example, we would aim to align the Light Aircraft Pilot Licence (LAPL) with the National Private Pilot Licence (NPPL) with the Microlight Aeroplane Class Rating. This exercise would require amendments to the ANO and the Aircrew Regulation, both secondary legislations, so that for the Sub-ICAO licences, the Part-FCL and ANO requirements would effectively mirror one another.

3.10 This approach would have two benefits. First, it would allow us to proceed with our project of integrating and simplifying GA pilot licences and ratings in a timely manner, while still operating within the constraints of the *current* UK aviation legislation framework.

3.11 Second, the resulting licensing regulation we create in this project would be 'ready' for any future primary legislative changes should they be enacted.

[11] We do occasionally issue the UK PPL(A) in accordance with the ANO, this is very rare. Besides which, we still look to Part-FCL for the specific requirements for that licence.

Chapter 4

The ICAO-compliant aeroplane and helicopter licence

4.1 The Private Pilot Licence (PPL) is the main flight crew licence for GA aeroplanes and helicopters and with nearly 6,800 currently active PPLs in force in the UK, it is the most popular. The PPL(A) for aeroplanes and PPL(H) for helicopters are compliant with Annex 1 of the ICAO standards and recommended practices and as such licence holders can benefit from recognition for flying a UK-registered aircraft in any ICAO Contracting State.[12] When combined with appropriate class and/or type ratings, the PPL allows the pilot to fly a wide variety of aircraft within the category of the licence. Both make it a viable entry point towards a commercial or public transport aviation career.

4.2 Although there are clear strengths with the PPL, we do need to look at some of its challenges. First, while the vast majority of the PPLs are issued as UK licences compliant with the retained Part-FCL regulations, there are also some issued under the ANO. Second, we think there are some provisions in UK Part-FCL regulations that go beyond the ICAO standards.

Create a single ICAO-compliant PPL

4.3 Virtually all PPLs we issue are done so in accordance with the retained Aircrew Regulation (specifically Part-FCL). However, we still maintain the ability to issue licences in accordance with ANO Schedule 8, and the existence of two PPLs is confusing. The ambition is to bring the PPL in the retained Part-FCL together with its equivalent issued under the ANO into a singular ICAO-compliant PPL.

Reassess Part-FCL provisions that go beyond ICAO standards

4.4 After safety, our next most important priority for the PPL is to maintain the ability for holders to continue to benefit from the right of non-scheduled flight granted by the Chicago Convention. This requires full compliance with the ICAO standards and recommended practices.

4.5 As part of Phase 2 of this project, we will undertake a detailed review of the PPL(A) and PPL(H) provisions in Part-FCL and aim to revise or remove any provisions that we think go beyond the ICAO standards and there is no justifiable safety reason for their existence.

[12] Note that the PPL(G) for gyroplanes is not an ICAO licence. Also, the PPL(S) and PPL(BA) for sailplanes and balloons/airships respectively are also ICAO licences but they have been replaced by the Sailplane Pilot Licence (SPL) and Balloon Pilot Licence (BPL) and will be discussed in more detail in Chapters 6 and 7.

4.6 Whilst we acknowledge alignment with EASA can be important for especially commercial and air transport licences, this is not necessarily the case for GA. This is because the UK is now a third country with respect to the EU, so any licence issued by us regardless of compliance with EASA regulations are not recognised for equivalence by EU national aviation authorities. Although bilateral arrangements covering GA licences are feasible, we believe progressing this project to arrive at the best solution for the UK GA community is the most appropriate way forward at this time.

4.7 As our priorities are upholding safety standards and ICAO compliance, if the Part-FCL 'gold plating' has a clear safety justification then we will maintain that; and conversely will curtail it if no such justification exists. This exercise will be undertaken as part of Phase 2 of this project.

Consultation Question 4

Do you agree with our approach about reassessing provisions in UK Part-FCL that go beyond the ICAO standards?

- Yes
- No
- No view/don't know

Use Part-FCL as a starting point for complying with the international standards

4.8 Although we are looking to depart from Part-FCL, we will use those regulations as a basis for the PPL requirements. This is because we wish to minimise change and potential disruption for pilots, owner/operators and flying schools who are used to complying with EASA requirements. Besides which the EASA regulations are an internationally recognised example in its interpretation of the ICAO standards. However, we will also look to best practices in other jurisdictions such as the United States, Australia and Canada should we think them appropriate to the UK situation.

4.9 We have begun a process of mapping the Part-FCL requirements against the relevant ICAO standards specified in Annex I Personnel Licensing, and Phase 2 of this project will examine this material in further detail.

Consultation Question 5

Are there any specific areas within Part-FCL that we should particularly focus on when reassessing the need to go beyond ICAO standards?

- Comments: _____
- No view/don't know

Chapter 5

Sub-ICAO licensing: an entry point into GA?

5.1 Not all flight crew licences meet the standards of ICAO Annex 1, and not all pilots wish to fly outside the UK. Since the development of the Microlight Rating (Group D) in the 1980s we have made available a 'sub-ICAO' licence or rating that offers holders the ability to fly without having to meet international requirements.

5.2 There are several issues with the current offering of sub-ICAO licences, namely that we offer several options to student and pilots across the ANO and UK Part-FCL regimes. Some of the options allow for crediting towards an ICAO standard licence, we question whether this is more complex than it needs to be. This chapter will look at how we would hope to address these matters with a view to creating a simpler and more intuitive solution for both new and existing pilots.

5.3 We currently offer two sets of sub-ICAO pilot certificates: issued in accordance with the ANO there is the National Private Pilot's Licence (NPPL) available for aeroplanes, microlight aeroplanes, motor gliders and helicopters and a PPL for gyroplanes. Issued in accordance with Part-FCL there is the Light Aircraft Pilot's Licence (LAPL) available for aeroplanes, touring motor gliders and helicopters. Both differ slightly and can be summarised in the following table:

Licence	Aircraft scope	Restrictions	Requirements/Notes
National Private Pilot Licence (Aeroplanes) NPPL(A)	Non-Part 21 aeroplanes: • Microlight aeroplanes • Self-Launching Motor Gliders (SLMGs); • Simple Single-Engine Aeroplanes (SSEAs) • Touring Motor Gliders (TMGs) • Part 21 aeroplanes can be flown, further to a recent amendment to the UK Aircrew Regulation.	• Day/night* Visual Flight Rules (VFR) only • G-registered aeroplanes in UK airspace (or unless by host-state individual or general permission) • Cannot endorse Instrument Rating (Reduced) (IR(R)) or Instrument Rating (IR) • Flight Instructor (FI) certificate for microlight aeroplanes and Self Launching Motorgliders (SLMG). *(with a Night Rating)	• Can use Pilot Medical Declaration (PMD) as a student pilot and after licence issue. • Endorsed with a rating for the class of aircraft flown. • Requirements to gain a Microlight, SSEA and SLMG class ratings differ • Examinations differ between Microlights and SSEA/SLMG. • Microlight aeroplanes, SLMGs and SSEAs defined in the ANO • Although inter-rating cross-crediting is allowed between ratings, there is an intersection between the microlight and SSEA categories now that microlights can have an MTOM up to 600kg (650kg for amphibians/floatplanes). However, this is not always the case: there are SEP types that have a maximum take-off mass of less than 450kg which are not microlights as they do not meet the stalling speed or other technical requirements. • Revalidation of class ratings can be achieved by amassing flight experience in any or all the classes of aircraft that are endorsed on the licence. Dual refresher flight needs to be conducted with an instructor in one of the classes. • Ability to fly single seat aircraft without the need to revalidate with an instructor. • Renewal of any expired class ratings is conducted by an Examiner (FE or CRE) but is

Licence	Aircraft scope	Restrictions	Requirements/Notes
			specific to class of aircraft being flown. A Proficiency Check conducted in a Microlight is only valid to renew a Microlight Class Rating. However, the flight can meet the dual refresher requirement for other classes, if required. • NPPL(A) with Microlight Class Rating can gain a Flight Instructor and Flight Examiner Certificate for Microlights. • NPPL(A) with SLMG Class Rating can gain a Flight Instructor and Flight Examiner Certificate for SLMG.
National Private Pilot Licence (Helicopters) NPPL(H)	Non-Part 21 Helicopters	• Day VFR only • G-registered helicopters in UK airspace only (unless by permission) • Cannot endorse Night or IR rating or Flight Instructor Certificate for Helicopters.	• Can use PMD as student pilot and after licence issue. • Can only be issued based on holding a Part-FCL helicopter licence when endorsing a Non-Part 21 helicopter type rating.
UK Private Pilot Licence (Gyroplanes) PPL(G)	Non-Part 21 Gyroplanes Part-21 Helicopters can be flown under an amendment to the Aircrew Regulation.	• Day/night VFR only • G-registered gyroplanes in UK airspace only (unless by permission) • Flight Instructor Certificate for Gyroplanes only	• Can use PMD as student pilot and after licence issue. • Uses the core examinations from the NPPL(A) with Microlight Class Rating. • Additional technical examinations for gyroplanes • Limited credit to other licences. • Can continue to train for CPL(G).
Light Aircraft Pilot Licence (Aeroplanes) LAPL(A)	Aeroplanes: Part 21 within the SEP and TMG classes Non-Part-21 aeroplanes can be flown under ANO Article 150.	• Day/night VFR only • G-registered aeroplanes in UK airspace (or unless by host-state individual or general permission) • Aeroplanes MTOM ≤ 2000kg with no more than 3 passengers • 10hr PIC prior to carrying passengers. • Cannot endorse IR(R) or IR rating or Instructor Certificates	• Can only use PMD once licence issued (i.e. student pilot must receive at least LAPL Class Medical). • Same examinations as the PPL(A). Credit for core examinations to other categories of licence. • Proportionate course for upgrading to PPL(A). • Can endorse aerobatics, towing and night ratings. • Maintenance of privileges by rolling validity.
Light Aircraft Pilot Licence (Helicopters) LAPL(H)	Part 21 single engine Helicopters only, as per type rating. Non-Part-21 helicopters can be flown under ANO Article 150.	• Day VFR only • G-registered helicopters in UK airspace only (unless by host state individual or general permission). • Single engine helicopters with a MTOM of 2000kg with no more than 3 passengers • Cannot endorse an IR(H) or Instructor privileges	• Can only use PMD once licence issued (Student pilot must receive at least LAPL Class Medical). • Core exams same as aeroplane, then category specific. Crediting between licences. • Proportionate course for gaining PPL(H). • Crediting of flight experience from other categories by assessment from training organisation. • Type ratings valid for 12 months, can be revalidated by Proficiency Check or by experience. • Can fly single engine turbine helicopters, with type rating.

Existing scope and privileges

5.4 Looking at other states that offer sub-ICAO pilot licences, there are some essential characteristics for the licence, for example:

- reduced minimum amount of flight training for the issue of the licence;
- flexible medical fitness provision; and
- proportionate maintenance of privileges, through greater acceptance of flight experience in different categories of aircraft.

5.5 Although there are differences between this licence and the PPL, there should be a proportionate route to ensure continuous progression to not only flying different aircraft, but also gaining different licences, ratings or certificates.

a) Aeroplanes: NPPL(A) and LAPL(A)

5.6 The initial consideration should be how to take advantage of the benefits of each licence without the disbenefits in favour of a single set of sub-ICAO licences for aeroplanes and helicopters.

5.7 The training syllabus for LAPL(A) and NPPL(A) are broadly similar but there are some notable differences between the two licences, and between the different ratings that could be added to the NPPL:

a) **Privileges:** both the LAPL(A) and the NPPL(A) with the Simple Single Engine Aeroplane allow holders to exercise their privileges as Pilot-in-Command of any single-engine aeroplane weighing up to 2,000kg and carrying up to 3 passengers. The NPPL(A) with the Microlight Aeroplane rating limits the holders to act as Pilot-in-Command of microlight aeroplanes, which are currently limited to 600kg (650kg for floatplanes/amphibians).

b) **Hours to complete:** NPPL(A) requires 32 hours of training plus 2 Skills Tests, whereas the LAPL(A) requires 30 hours of training and Skills Test.

c) **Operational limitations:** the NPPL(A) introduced the concept of allowing a pilot to fly unsupervised after a reduced amount of time (15 hours instruction) subject to certain limitations: prohibiting the carriage of passengers, flight in certain cloud base/visibility minima and not more than 8 nautical miles from the take-off site. This allows a pilot to progress their flying, gain experience, and pass certain milestones before the limitations could be removed. Such limitations were considered at the EASA level for the LAPL (shaped by the UK microlight sector but also practices in other jurisdictions such as France) but were never introduced.

d) The LAPL(A) requires the pilot to amass at least ten hours flying experience as Pilot in Command post-licence issue before passengers can be carried.

e) Progression within the NPPL(A) from the microlight aeroplane rating to SSEA requires the passing of a Skills Test. Additional flight training is also required. Spin awareness, stalling and instrument appreciation. This needs to be reviewed, especially considering that microlight landplanes themselves can now weigh up to 600kg and therefore, may share many characteristics of the SSEA category.

5.8 The LAPL(A) does not have class ratings endorsed in the same way as the NPPL(A) or PPL(A) and because of this the maintenance of privileges is different to those licences. The privileges for SEP or TMG remain valid under a rolling 2-year validity period applying to the date of flight. There are advantages and disadvantages of rolling validity, for example:

a) No licensing action necessary, to maintain the privileges endorsed in the licence.

b) Different to what many licence holders are used to, as such, some licence holders do not understand the requirements and may be unwittingly flying with expired privileges.

c) After initial issue, we cannot track pilot's validity as no revalidation notification is possible with rolling privilege expiry dates.

5.9 There is no indication of validity in the holder's licence as no entries are made in the Certificate of Revalidation. A similar system that was originally in the NPPL was subsequently replaced by a fixed two-year validity period and endorsement in the Certificate of Revalidation. The revalidation requirements for the NPPL(A) also have benefits and disbenefits.

a) The revalidation by experience allows flight experience amassed if holding more than one class rating to count towards the revalidation of each class rating endorsed. However, this does mean that licensing action is required to endorse class ratings.

b) The flight training requirements to gain both the NPPL(A) and LAPL(A) are very similar. Hours-based flight training has been a fundamental element of flight safety for decades. However, developments in both competency and evidence-based training have underscored the importance of achieving the necessary standard (through a combination of theoretical knowledge examination and practical demonstration of competency by Skill Test) as opposed to simply amassing the minimum numbers of hours of training.

5.10 Therefore, we see an opportunity to consolidate the four different aeroplane licence/rating combinations into just one. In one respect, we would be adopting the single licence model from the LAPL, thus doing away with the class ratings and replacing with a single licence with differences training and licence endorsements. In another respect, we would borrow the established syllabus for

the NPPL(A) with Microlight Class Rating as the blueprint for the syllabus for the sub-ICAO aeroplane licence, including the provision of partial privileges by use of the operational limitation. Our reasons for doing this are as follows:

a) it would effectively leave unchanged the existing Microlight Class Rating and would instead take advantage of the strength of that syllabus, instructor, and examiner community. This was reviewed and upgraded last year in response to our decision to increase the allowable weight limit of microlights.

b) it would ease the conversion for existing microlight pilots. Existing holders of the NPPL(A) with Microlight Class Rating would not have to undergo any conversion training. The other differences between the NPPL-microlight aeroplane rating and the NPPL-SSEA/SLMG rating or LAPL(A) would have to be reconciled as part of the detail in Phase 2 of this project, where we would examine the exact syllabus differences, analyse any safety considerations for those differences, and conclude whether and to what extent any formal conversion training and/or testing for existing LAPL(A) or NPPL-SSEA/SLMG holders would be necessary. We would aim to keep this to an absolute minimum and use informal differences training wherever possible.

c) combining the aeroplane class ratings into a single licence has already been done for the LAPL(A), and doing so would remove the confusion around SSEAs, Microlights and Single-Engine Piston aircraft, many of which share or have very similar handling characteristics. We are minded to also include SLMGs in this, depending on discussions with the gliding community.

d) we are minded that the microlight aeroplane training syllabus is sufficient to qualify pilots to operate aircraft up to the LAPL(A)/NPPL-SSEA/SLMG weight limit of 2,000kg, subject to differences training. This would create enough similarities to the LAPL/NPPL-SSEA/SLMG syllabus and any differences could be addressed with training.

e) it would allow training to take place in any aeroplane up to that weight range (which encompasses most of the UK single-engine GA fleet), subject to certification limitations and any exemptions that apply; whereas the LAPL(A) only allows training in certificated aeroplanes, and the NPPL SSEA/SLMG excludes microlights.

Consultation Question 6

Do you agree with our approach to create a single sub-ICAO licence for aeroplanes that would replace the NPPL(A) and LAPL(A)?

- Yes
- No
- No view/don't know

Consultation Question 7

Do you agree with our proposal to base the syllabus for sub-ICAO aeroplane licences on the existing NPPL(A) for the microlight aeroplane class rating?

- Yes
- No
- No view/don't know

Consultation Question 8

As you do not agree with our proposal which of these statements best describes your views?

- I have a Microlight Class Rating and it works perfectly well and extending it to other privileges would complicate things for me. Please elaborate on your answer if possible: ____
- I have a LAPL(A) and it works perfectly well and extending it would complicate things for me. Please elaborate on your answer if possible: ____
- Consolidating to a single licence would create confusion where there is no issue currently. Please elaborate on your answer if possible: ____
- It would introduce complications for training organisations: ____
- Other: _____

b) Helicopters: NPPL(H) and LAPL(H)

5.11 The NPPL(H) can only be issued to the holder of a Part-FCL helicopter licence so that any non-Part 21 helicopter type ratings can be endorsed. As such there are no differences between the licences in terms of syllabus or flight training requirements. The revalidation of type ratings endorsed in a NPPL(H) was aligned with the requirement in Part-FCL. The revalidation of type ratings endorsed in a LAPL(H) are different, in that holders can exercise the privileges of their licence on a specific type only if in the last 12 months they have either:

a) completed at least six hours of flight time on helicopters of that type as PIC, or flying dual or solo under the supervision of an instructor, including six

take-offs, approaches and landings and completed refresher training of at least 1 hour of total flight time with an instructor;

b) passed a proficiency check with an examiner on the specific type before resuming the exercise of the privileges of their licence. That proficiency check programme shall be based on the skill test for the LAPL(H).

5.12 Due to the similarities between the two licences, we see the opportunity to bring the two licences together. This would require us to endorse non-Part 21 helicopter types on to the Part-FCL licences.

5.13 All in all, we have proposed to consolidate the different sub-ICAO aeroplane and helicopter licences (especially the different aeroplane class rating/licence combinations) into a more manageable structure that could be summarised in this illustration: moving from what are potentially six different sets of privileges into just two.

Existing/proposed sub-ICAO licence/class rating structure

Existing licence/rating combination	Proposed licence
NPPL(A) with Simple Single Engine Piston class rating	Sub-ICAO Licence (Aeroplanes)
NPPL(A) with Microlight class rating	
NPPL(A) with Self-Launching Motor Glider class rating*	
LAPL(A)	
NPPL(H)	Sub-ICAO Licence (Helicopters)
LAPL(H)	

*Subject to discussions in relation to the rest of the sailplane community

Consultation Question 9

Do you agree with our approach to create a single sub-ICAO licence for helicopters that would replace the NPPL(H) and LAPL(H)?

- Yes
- No
- No view/don't know

Eliminate the sub-ICAO licence altogether?

5.14 The first question for consideration is whether we should continue to offer a dedicated sub-ICAO licence at all. One argument follows that the only substantive difference between the PPL and the sub-ICAO licence is that the

latter relaxes the medical requirement. The ICAO-compliant PPL requires at least a Class 2 medical certificate for licence issue under UK Part-MED, whereas Part-FCL LAPL holders can use the more relaxed general practitioner-endorsed LAPL medical certificate for licence issue. For the last six years we have also offered the opportunity for a pilot to self-declare under the Pilot Medical Declaration system, once they have a licence. More recently, the PMD has been extended to the full range of private pilot licences including the LAPL and PPL, allowing the pilot to circumvent formal medical certification in favour of a self-declaration, regardless of the nature of pilot licence held, provided all flight is private and taking place in UK airspace only. Going back to the argument, if we have effectively relaxed the medical certification for any private licence-holder flying in UK airspace only, what is the point of maintaining a dedicated sub-ICAO licence?

5.15 We would disagree with this argument, because there are other important differences between the sub-ICAO licence and the ICAO PPL than just medical. A comparison between the minimum standards for the PPL aeroplane category rating set out in ICAO Annex I with those of the microlight aeroplane standards can be summarised in the following table:

	PPL aeroplane category rating	**Microlight aeroplane**	**Notes**
Scope of aeroplane	Single engine landplanes up to 5,700kg	Single engine landplanes up to 600kg	Also, floatplanes/amphibians subject to slightly higher weight limits
Flight time, total, minimum hours	45	25 without operational limitations 15 with operational limitations	Microlight operational limitations: • No passenger carriage • Flight not taking place if cloud base is less than 1000ft above ground level or with visibility of less than 10km • Flight not further than 8nm from home take-off site.
Flight time, solo, minimum hours	10	10 without operational limitations 7 with operational limitations	
Qualifying Cross Country (QCC) solo	Required 5 hours 1x cross-country solo flight involving: • minimum distance 150nm and • involving 2x full-stop landings at 2x different aerodromes.	Optional, depending on limitations. With operational limitations: none Without operational limitations: 5 hours navigation flight training and minimum solo navigation training of 3 hours. Solo involving EITHER 1) 2x flights within a 9-month period, each of which • is a minimum distance 40nm and • involving 1x full-stop landing at a site at least 15nm from home aerodrome OR 2) 1x flight involving: • minimum distance 100nm and • involving 2x full-stop landings at 2x different aerodromes.	
Flight training syllabus	Broadly similar except PPL requires: Flight by sole reference to instruments, including the completion of a 180 turn; and		

	PPL aeroplane category rating	Microlight aeroplane	Notes
	Operations to/from controlled aerodromes		
Theoretical knowledge	Broadly similar		

5.16 As can be seen in the table, the PPL(A) is more stringent in terms of both hours and requirements. Looking at hours alone is not sufficient: as we stated above, our focus on competency/evidence-based training takes precedence over merely hours, besides which the time taken for a person to reach sufficient standard to pilot an aeroplane unsupervised is ostensibly the same. However, the main difference is that the microlight rating introduces the operational limitations which allows a pilot to qualify with fewer learning objectives, and therefore receive a limited licence quicker. It acknowledges that some pilots might *only ever* wish to fly subject to these limitations, and they *might never* wish to undergo a Qualifying Cross Country flight which is itself less onerous than the PPL(A) requirement in terms of both distance and land-aways.

5.17 Another important difference between the two licences is issuing authority: we cannot delegate the issue of a single unified licence. The ICAO PPL can only be issued by the CAA as an ICAO Contracting State Competent Authority. This is entrenched in the Chicago Convention to which the UK is a signatory and cannot be changed. Whereas we can delegate to associations the issue of the sub-ICAO licence (as we currently do with the BMAA for the Microlight licence).

5.18 So there remain *some* discernible differences that warrant keeping a sub-ICAO licence. Suddenly requiring sub-ICAO licence holders to meet the ICAO standards and taking the licence-issuing authority away from the BMAA, would cause considerable disruption. It would also run contrary to some of our operating principles described in Chapter 2 including simplification, accessibility, and delegation.

5.19 Our view is that we should continue to offer sub-ICAO licences for the different categories of aircraft as it benefits the community. Especially for those who do not wish to go to the effort and expense of complying with international standards that they might never need. Moreover, we think sub-ICAO licences could prove to be a cost-effective entry point into the world of GA flying.

Chapter 6

Better integration of the aeroplane/helicopter licences

6.1 Examining the requirements of microlight and PPL syllabuses does highlight some vital similarities as well, which makes us think more could be done to better integrate the ICAO/sub-ICAO licences that currently exist for aeroplanes and helicopters.

6.2 While we would have no intention of bringing the aeroplane and helicopter requirements together; we think there are *similarities* to suggest integrating into a single syllabus the ICAO and sub-ICAO variations of those licences for aeroplanes and helicopters.

Proposing a PPL (Light)

6.3 We could tentatively name the sub-ICAO variation of the PPL the PPL (Light). In this fashion, a Private Pilot Licence (Light) could be offered for either aeroplanes or helicopters: a PPL(L)(A) or a PPL(L)(H) respectively.

6.4 The 'Light' qualifier in the licence title would denote its sub-ICAO identity of flight in UK airspace only, in aeroplanes or helicopters meeting the weight limitation of 2,000kg. Moreover, other operational limitations could be imposed like those available to the Microlight Class Rating.

PPL(L) vs PPL Syllabus: Simplified Comparison

Syllabus Learning Objectives	PPL(L)	PPL
LO-1 (eg core Theoretical Knowledge)	✓	✓
LO-2 (eg General handling)	✓	✓
LO-3 (eg Takeoff/Landing)	✓	✓
LO-x (e.g Navigation)	✓	✓
LO-y (e.g Instrument flying)	-	✓
LO-z (e.g Qualifying Cross Country)	-	✓

✓ PPL(L) with operational limitations: no passengers, viz/cloud minima, <8nm from base

✓ PPL(L) no operational limitations

6.5 This would allow pilots to start with the basics and work (at their own pace) to have the operational limitations and then sub-ICAO restrictions progressively removed on the path to a full ICAO-compliant PPL(A) or PPL(H) if they wish. Alternatively, the pilot could choose to *only ever* fly subject to the sub-ICAO restrictions (as holders of an NPPL with a Microlight Class Rating currently do), or even with the sub-ICAO operational limitations. The stylised chart in the figure here illustrates how this standardised syllabus could look in practice. Each milestone might be denoted by a series of 'learning objectives' comprised of theoretical and practical

elements based on the current and theoretical knowledge examinations and practical syllabus lessons.

6.6 This would benefit training organisations, as the process of removing operational limitations and sub-ICAO restrictions through the demonstration of competence is broadly similar to what is already done. In Phase 2 of this project, we could look at how to develop the appropriate crediting, conversion, and assessment processes.

6.7 When taken together with removing as described above the confusion of all the different class ratings that could be added to an NPPL(A), this move could significantly simplify the licensing system certainly for aeroplanes and helicopters, replacing what is ostensibly seven different sets of privileges with just two, each with a full ICAO and Sub-ICAO 'Light' variation.

Potential cost benefits

6.8 Another benefit of the PPL/PPL(L) approach based on a standardised syllabus is that it would allow training to be conducted in any aircraft within the category subject to certification limitations. For example, for aeroplanes, the training could be conducted in either a microlight or a Certificate of Airworthiness Single-Engine Piston aeroplane, subject to limitations concerning for example amateur-built Permit-to-Fly platforms.

6.9 Although it is too early in this project to undertake a formal costing analysis, we believe that given that the per-hour cost of training in a three-axis microlight aeroplane is less than the average single-engine Certificate of Airworthiness platform, pilots could potentially attain the PPL at a lower cost. They could also reduce or spread the cost of their training more proportionately if, for example, they do not wish to fly outside UK airspace.

Existing sub-ICAO licences holders

6.10 For existing sub-ICAO licence holders, we propose for those NPPLs and LAPLs to be converted to the PPL(L), and options to achieve this are discussed in more detail in Chapter 9 below.

6.11 We would like to model the PPL(L) syllabus as much as possible on the NPPL with the Microlight Class Rating, thus minimising the need for conversion training or testing. We will also closely examine the NPPL-SSEA and LAPL syllabuses as part of Phase 2 of this project to understand any deviation from the microlight aeroplane syllabus, with an aim to reduce the need for conversion training or testing for them. If there is an unavoidable need for such conversion, we will as a last resort explore a system of limitations based on existing privileges.

Consultation Question 10

Do you agree with our preferred approach to create a single PPL for aeroplanes or helicopters each with ICAO and sub-ICAO variations?

- Yes
- No
- No view/don't know

Consultation Question 11

Which of the following statements best describes your view towards this proposal of offering such single PPLs for aeroplanes and helicopters each with full and light variations?

- The proposal would work as described and would address all the issues I can think of.
- The proposal is interesting, but the following additional issues would need to be addressed for it to work.
- I'm not sure this proposal would work because of the following insurmountable issues.
- No view/don't know

Issuing authority and approvals

6.12 This approach of standardising the syllabus also addresses challenges presented around the issuing authority and approvals. As the PPL(L) would be a sub-ICAO licence, we could continue to delegate its issue. However we would issue the ICAO PPL. Pilots wishing to convert their PPL(L) to a fully ICAO-compliant PPL (once they have completed any conversion training) would apply to us.

6.13 We might also only allow Approved or Declared Training Organisations to undertake the training and verification for that full licence, which would allow non-ATO/DTOs to choose whether they wish to continue to either offer just PPL(L)s for a lower cost or obtain at least DTO status if they wish to become a 'one-stop shop' for PPL(L)s and PPLs.

Consultation Question 12

Do you agree with our view to only permit DTOs/ATOs to lead training towards the full ICAO PPL?

- Yes
- No
- No view/don't know

What are your views, if any? _____

Allowing the addition of the IR(R) Rating

6.14 Currently the Instrument Rating (Restricted) cannot be added to either a LAPL(A) or NPPL(A), as those licences are only meant for visual-only operations. One reason for this is that many aircraft within the scope of the sub-ICAO licence (e.g. microlights and SSEAs) are either Permit-to-Fly platforms which have a VFR restriction or are not equipped for flight in instrument conditions. Note that the NPPL *does* allow a Night Rating to be added.

6.15 Another reason for the visual restriction is medical. Any Instrument Rating, even the IR(R) and Night Rating requires a certain minimum medical standard (mainly visual acuity and no colour-blindness) which the LAPL Medical or Pilot Medical Declaration do not verify.

6.16 Nevertheless, we think there are some safety benefits of allowing PPL(L) holders to be able to undertake training and become qualified to operate an aircraft in instrument conditions, depending on how their aircraft is equipped. This is especially the case if the consolidated licence allows the holder to exercise privileges in any G-registered aircraft up to 2,000kg and 3 passengers, in so doing, incorporating the vast majority of the GA single-engine fleet, including Certificate of Airworthiness aircraft, many of which are equipped to fly in instrument conditions.

6.17 From a medical perspective, we think there may be measures to surmount these issues. Depending on responses to this consultation, we would explore in Phase 2 of this project the possibility of identifying the specific areas that need assessment and offering a reduced medical certificate covering just those restrictions. For example, the prospective IR(R) holder could be required to pass a certain minimalised eye examination which could be performed by any optometrist.

6.18 With Controlled Flight into Terrain in instrument conditions continuing to be one of the leading causes of GA accidents, we would support any measure to allow more pilots to train to operate and recover safely using instruments, and to be

aware of and respect the limitations and risks associated with flight in those conditions that is included in such training.

Consultation Question 13

Do you agree that PPL(L) holders should be allowed to hold an Instrument Rating (Restricted)?

- Yes
- No
- No view/don't know

What are your views, if any? _____

Chapter 7

Balloon flight crew licensing

7.1 As indicated in the first chapter, ballooning (including fare-paying passenger-carrying operations and other commercial ballooning) falls within the remit of this project. Unlike the rest of GA that excludes most commercial operations especially public transport and commercial air transport, we regulate commercial ballooning uniquely, and this chapter looks at the strategic direction we intend to take with regards to licensing for those activities and culminates in two consultation questions on this theme.

7.2 The UK has long enjoyed a healthy and active ballooning sector supported by a domestic balloon manufacturing sector that enjoys worldwide market access and reputation. Most balloon operations were regulated by EASA and the last several years before the UK's departure from the EU, we were heavily involved in reforming EASA regulation to create a unique balloon regulatory regime that encompasses both private and commercial ballooning. Post-EU exit, we see an opportunity to reform this regulation still further to best suit the UK's vibrant community.

7.3 There are three types of ballooning operations in the UK: private ballooning, commercial operations excluding commercial passenger ballooning (what used to be called 'aerial work'), and commercial passenger ballooning.

a) Private ballooning

7.4 This was covered by the Private Pilot Licence (Balloons & Airships) issued under the ANO before being superseded by the Balloon Private Licence (BPL) when EASA took over regulation of most ballooning.

b) Commercial Operation excluding Commercial Passenger Ballooning ('aerial work')

7.5 Another sub-sector of the ballooning community involves paid-for commercial balloon operations that do not involve fare-paying passengers, in what used to be termed 'aerial work'. This mainly takes the form of aerial advertising at events. The skill sets required are not dissimilar to those of private ballooning however there is more content on tethered operations which carry their own risks.

7.6 The situation is less complicated given that the balloons, although sometimes more complex to operate, are generally of similar size to those operated by private pilots, and do not carry fare-paying passengers. The additional flying skills required are usually brought about by experience rather than additional training, and commercial non-passenger balloons often fly alongside private balloons.

c) Commercial Passenger-carrying Ballooning (CPB)

7.7 Commercial operators in the UK were originally governed under the terms of an Air Operators Certificate (AOC), also issued from the mid-1980s. Since 2019, companies or individuals operating hot air balloons with fare-paying passengers are required to hold Declared Balloon Operator (DBO) status, which wholly replaced the AOC system. Commercial passenger flying in the UK is well respected throughout the world, with an enviable safety and operational record which resulted in ballooning avoiding the more complex oversight and licensing processes involved in other aviation commercial public transport activities.

7.8 The skill sets required of a CPB pilot are significantly different from that of a balloon private pilot which gives rise to the question of whether simply adding a commercial rating to the BPL as is presently the case under the UK Part-BFCL rules provides sufficient grounding for such activities.

7.9 We propose to review the syllabus and requirements for these licences and ratings as part of Phase 2 of this project, in which we intend to convene a working group comprised of specifically balloon subject matter experts representing all three types of balloon operations. But in the meantime, we would like to pose the following consultation question on our overall approach.

7.10 Given the implementation of UK Part-BFCL by the deadline of December 2023, we appreciate the urgent need for regulatory clarity once the outcome of this consultation is determined. Therefore, we will aim to prioritise and accelerate decision-making on this theme (and the equivalent for sailplanes – see Chapter 8 below) as soon as possible after this consultation closes.

Consultation Question 14

What is your preference regarding the licensing required to act as a pilot-in-command for commercial balloon operations excluding commercial passenger ballooning ('aerial work') operations?

- These privileges should be managed via a commercial rating on a single balloon pilot licence.
- These privileges should be subject to a separate commercial balloon licence.
- No view/don't know

What are your additional views on this, if any? _____

Consultation Question 15

What is your preference regarding the licensing required to act as a pilot-in-command for Commercial Passenger Ballooning operation?

- Commercial passenger ballooning pilot privileges should be managed via a commercial rating on a single balloon pilot licence.
- Commercial passenger ballooning pilot privileges should be subject to a separate commercial balloon pilot licence.
- No view/don't know

What are your additional views on this, if any? _____

Chapter 8

Sailplane licensing

8.1 Sailplane or glider regulation has evolved significantly over the last few years, initially with the implementation of the EASA LAPL(S) and Sailplane Pilot Licence (SPL).

8.2 The implementation of Regulation (EU) No. 2020/358 amending Regulation (EU) No. 2018/1976, removed sailplanes from Part-FCL and enacted specific regulations for sailplane flight crew licensing (Part-SFCL) – a major simplification from Part-FCL.

8.3 The current position is a mixture of pilots holding British Gliding Association (BGA) Certificates, pilots holding a NPPL(A) with SLMG Class Rating and those pilots who hold a Part-SFCL SPL.

8.4 We are seeking the view of the community as to whether the planned full implementation of the SPL should go ahead.

Background

8.5 The UK is an International Civil Aviation Organisation (ICAO) signatory. ICAO describes the international requirements for regulating aviation and includes within Annex 1 a ‘Glider Pilot Licence’. Prior to the 2008 introduction of regulated airworthiness of sailplanes in the UK, non-public transport and non-commercial gliding was unregulated in the UK. The UK filed differences with ICAO. To ensure standardisation and effective risk management, the British Gliding Association (BGA) and its membership utilise self-regulation through BGA requirements where appropriate to do so.

8.6 In 2008, EASA brought all but the smallest sailplanes into formal regulation. In 2012, implemented the Aircrew Regulations and subsequently in 2018, Sailplane Regulations for Air Operations and Sailplane Pilot Licensing.

8.7 At the time of the UK’s exit from the EU, single-seat sailplanes over 250kg and two-seaters over 400kg were within the scope of the EASA Sailplane Regulations and the UK was working towards the implementation of licensing requirements in accordance with Part-SFCL.

8.8 A glider weighing less than those weights is defined in the ANO as a ‘Non-Part-21 Glider’ and those operating on non-public transport or non-commercial operations over UK airspace are not regulated by us from a perspective of airworthiness or pilot licensing.

8.9 The implementation of the EU Part 'Flight Crew Licensing' (Part-FCL) regulation included pilot licensing rules for sailplane flying based on rules for flying commercial aeroplanes, and as such were disproportionate and overly complex. As a result, a rulemaking task informed by European gliding community subject matter experts removed sailplanes from Part-FCL and resulted in the Part 'Sailplane Flight Crew Licensing' (SFCL) requirements. The BGA represented the UK on this rulemaking task to ensure the views of the UK gliding community were taken into consideration.

8.10 Part-SFCL collects all sailplane categories into one class available on one ICAO-compliant Sailplane Pilot Licence (SPL), whereas, for example, the UK ANO had sailplanes under one system, TMGs under another system, and self-launching sailplanes dropping into a gap between those systems. Part-SFCL facilitates a single, structured, and cohesive training system that is concerned with output standards and has risk management built into it from the outset.

8.11 There is still no requirement under UK law to be qualified or licensed as a pilot of an unpowered sailplane. For decades, the BGA has required its member pilots of unpowered sailplanes to hold a BGA gliding certificate to which endorsements may be added, including an instructor rating. Currently, pilots of unpowered sailplanes are either operating under BGA Gliding Certificate and endorsements or a Part SFCL SPL issued by the CAA.

8.12 Pilots of powered sailplanes have historically been required by the ANO to hold a valid Self Launching Motorglider (SLMG) Class Rating. This must be endorsed on an aeroplane pilot's licence for example, a NPPL, PPL, CPL or a ATPL(Aeroplane).

8.13 Part-SFCL has led to simplification for these pilots, as powered sailplanes can now be flown by the holder of a Part-SFCL SPL with an extension to fly Touring Motorgliders (TMG).

8.14 Under the recent amendments to the retained regulations, pilots of Part-21 sailplanes are not required to hold a Part-SFCL SPL until 8 December 2023. The conversion of BGA Gliding Certificate and endorsement privileges to a Part-SFCL SPL is supported by the BGA under CAA delegated authority. Some 2000 sailplane pilots in the UK hold a Part-SFCL Sailplane Pilot Licence with various privileges, including for example instructing, aerobatics, flying powered sailplanes, and sailplane towing with TMGs.

Whether to proceed with Part-SFCL

8.15 There is now an opportunity for us to consult on whether the UK proceeds with Part-SFCL implementation.

8.16 In this consultation, we would like to explore two options:

- Option 1 – Proceed with the implementation of Part-SFCL SPL while working with the BGA to modify the legislation and the delivery of these regulations
- Option 2 – Repeal the SPL and revert to the unregulated status for pilots of unpowered sailplanes.

8.17 There are considerations associated with each option as described below.

Option 1: Proceed with implementation of Part-SFCL but work with the BGA to modify the legislation and delivery of these regulations

8.18 Sailplane pilots who have not applied for a Part-SFCL SPL will need to do so by 8 December 2023.

8.19 Holders of a SPL will continue to be able to use their licence privileges, including those relating to motorgliders.

8.20 A single system that has had risk management, safety and future proofing designed into it from the outset will remain.

8.21 We will look to delegate as much of the administration and oversight of Part-SFCL as permitted to the BGA.

8.22 As with the Part-FCL Private Pilot Licence for aeroplanes and helicopters, we will conduct a review of Part-SFCL in Phase 2 of this project. We will work with the BGA to identify any further amendments to the regulations that will maintain proportionate safety standards, benefit the community and deliver on the stated aim to simplify the regulations, whilst ensuring that the regulation is aligned with ICAO Annex 1.

8.23 Holders of a SPL may be able to take advantage of ICAO mutual recognition when flying sailplanes outside of the UK, provided they also hold a valid Class 2 Medical Certificate.

8.24 The UK would no longer need to file a difference with ICAO in relation to the ICAO Annex 1 glider pilot's licence.

8.25

Option 2: Repeal the SPL and revert to the unregulated status for pilots of unpowered sailplanes

8.26 We would look to return to the BGA Gliding Certificate structure for Part-21 sailplanes other than motorgliders.

8.27 There are no plans at present to repeal the retained Air Operations Regulations for Sailplanes.

8.28 We may be required to revoke or request the surrender of all Part-FCL and Part-SFCL sailplane licences issued, and we would not be able to refund fees paid for these licences, ratings or certificates.

8.29 We will need to identify how to allow unregulated pilots to fly Part 21 sailplanes if Part-SFCL is repealed.

8.30 Pilots who fly motorgliders will be required to hold a pilot's licence with a valid motorglider class rating.

8.31 The UK would maintain the filed difference with ICAO in relation to ICAO Annex 1 glider pilot's licence.

8.32 Sailplane pilots may not receive recognition of their flying qualification when looking to fly outside of the UK.

8.33 The sailplane community is working towards the implementation of UK Part-SFCL by December 2023, and therefore urgently need regulatory clarity once the outcome of this consultation is determined. Therefore, we will aim to prioritise and accelerate decision-making on this theme (and the equivalent for balloons – see Chapter 7 above) as soon as possible after this consultation closes.

Consultation Question 16

What is your preferred option for sailplane licensing?

- Option 1: continued implementation of Part-SFCL SPL and work with the BGA to modify the legislation.
- Option 2: Repeal the SPL and revert to unregulated status for pilots of unpowered sailplanes.
- No view/don't know

Chapter 9

Retrospectivity: Honouring licences already issued

9.1 A key issue will be the status of licences, ratings and certificates offered under the existing framework. Licences are by their nature lifetime, so any changes to the regulatory regime need to consider existing licences, to determine the best approach for ongoing recognition. This paper examines this retrospectivity issue, explores the options and implications, and proposes solutions.

9.2 There remains the question of what existing licence holders would be required to do: whether they need to retain their existing licence under a legacy system, transition to the new licensing system, enjoy some sort of 'deemed valid' solution, or some sort of combination of the last two approaches.

9.3 In this chapter, we look at the potential options under consideration and weigh up their pros and cons and assess the balance.

Option A: New structure only applies to new licence issues

9.4 In this option, any reforms to the licensing structure derived from this project would only apply to licences issued after the legislative amendments come into force. This would effectively create two licensing regimes: the existing one under the ANO and retained regulations for current licences which would remain in place until they organically disappear; and the new, consolidated system for new licence issues.

9.5 **Avoiding an unsafe situation:** not an issue under this option because existing licence-holders would be able to continue to fly without any change of privileges, so there would be no risk of an individual flying in excess of their demonstrated competencies.

9.6 **Minimising disruption:** again, not an issue as existing holders would simply continue as they currently are, while new trainees would begin to train under the new system.

9.7 **Avoiding more complexity/confusion:** this option would introduce two licensing systems: a legacy one and a new one. As long as the existing licences are valid, flying schools would have to train and administer on the basis of both, and individuals would have to identify which system they would have to comply with depending on when they started training, giving rise to additional complexity and confusion.

9.8 **On balance:** this option does appear to be the simplest of all approaches here but comes at a considerable cost of confusion/complexity, two items this project was specifically meant to address.

Option B: Immediate mandatory conversion of all licences

9.9 This would entail transitioning existing licence validity to comply with the new licensing regulatory system that we develop and requiring holders to immediately exchange their licence for the equivalent new one.

9.10 **Avoiding more complexity:** the result will be a simpler licensing system with one set of licences for both existing and new holders.

9.11 **Avoiding an unsafe situation:** licences and ratings in the new system would be designed to replicate those of the old system, so there should be limited risk of granting privileges to pilots that do not reflect their level of training competency, experience, and medical certification. While there might be disruption with this option (see below), the result will minimise confusion over what the licences are valid for, thereby minimising the safety risk of somebody allowed to exercise privileges to which they are not qualified.

9.12 **Minimising disruption:** this option would entail mapping out a transition process by which existing licence-holders would have to convert to the new system. For example, an NPPL holder with a Microlight Rating would exchange this for a PPL(L) which would confer the same privileges as previously. This would have three implications: first, we would be forcing people to exchange their licences for something they might not want. Second, we might be charging people for that process (a cost we are simply unable to estimate at this time). Finally, we would be imposing additional administrative costs on the CAA which would be borne ultimately by the licence-holder and/or public funds.

9.13 **On balance**: while this immediate 'mandatory conversion' option is inherently less confusing and thereby safer, the potential disruption and cost on the community would need careful consideration.

Option C: Existing licences retained and 'deemed valid'

9.14 This option constitutes a hybrid between Option A of retaining existing licence issues and Option B of transitioning all licences, in which existing licences are retained but their privileges are mirrored as much as possible to the equivalent new licence. Existing licences would be regarded by us as their equivalent under the new framework, thereby negating the need for any mandatory conversion.

9.15 For example, an NPPL holder with a Microlight Rating would be 'deemed valid' with respect to the PPL(Light)(Aeroplanes) with certain weight limitations and any operational limitations. This deemed validity would only apply to existing licence issues, so anyone training to obtain a first licence would be issued one under the new framework in accordance with the elements of the syllabus satisfactorily demonstrated.

9.16 **Minimising disruption:** this option would prevent much of the disruption described in Option B because holders would experience a near-seamless transition to the new system with minimal input from them. Privileges should be transitioned automatically, and any differences would be covered with differences training as presently. There would be no transfer costs because each holder could keep their licence and privileges unless they wish to upgrade to a larger type or variant within the class in which case differences training would have to be undertaken and paid for.

9.17 One challenge of this option will be the impact on exams and syllabus development. We would work with flying training organisations to develop a transitioning conversion course. While Phase 2 details should address differences in theoretical knowledge requirements between ANO and Part-FCL systems, preparation with a transitional period will be required.

9.18 **Avoiding more complexity:** this option does give rise to two significant challenges. First is the potential confusion created by legacy licences that would be valid for something other than what is readily apparent. For example, a NPPL holder with an endorsed SSEA rating would be deemed as a PPL(Light)(Aeroplanes). Second, the continued and long-term existence of these legacy licences does still create the confusion of a legacy licensing system still existing in addition to the new one, an inherent complexity that this project was meant to address. This also imposes a cost on us in additional training of staff processing licence applications to work with that complexity.

9.19 **Avoiding an unsafe situation:** this confusion/complexity described, especially where licences are valid for something other than what is immediately apparent, does give rise to a potential safety risk of an individual unintentionally being given access to an aircraft they are not qualified to operate. That risk however needs to be taken into context considering there already is a precedent for us allowing the continued validity of legacy licences (e.g., the former Joint Aviation Authority (JAA) licences).

9.20 **On balance**: while this ‘deemed valid’ option does address the potential disruption involved in Option B, there is an element of confusion/complexity that is worth considering.

Option D: ‘Sunset approach’: deemed valid for a transition period leading to mandatory conversion

9.21 This option combines Options B and C whereby legacy licences are deemed valid as in Option C for a finite transition period until a mandatory conversion.

9.22 One key benefit of this ‘sunset’ option is that by imposing a certain juncture after which legacy licences are no longer valid, it eliminates the key problem of Option

C which is the confusion and complexity of the prolonged existence of licences that are valid for something other than what is immediately apparent.

9.23 This approach still imposes the mandatory conversion element of Option B 'immediate mandatory conversion', however it removes that option's immediacy pressure through a prolonged transition period.

9.24 We would aim to make that conversion process as straightforward as possible for the community. Until we look at the details of the requirements for licences, ratings, and certificates in Phase 2; we are currently unable to discount the need for any conversion training or testing between the legacy and new licences, and licence limitations in the interim, or estimate the costs of that transition. However, we will endeavour as much as possible to minimise differences and as stated above, even look to licence limitation options.

9.25 Another issue with this 'sunset' option is that imposing a mandatory conversion carries administrative costs and resource strains on us in processing conversion applications. This could be particularly difficult in periods of high application volumes during the transition period and how these correspond with resource pressures on our staff from other issues.

9.26 We think there might be a way to smooth the trend of applications for licence conversion. Rather than impose a fixed conversion deadline (which would result in a 'stern wave' of last-minute applications); we would keep the conversion process under annual review to monitor the trend of natural conversions (e.g., changes of circumstances or details). Then we would determine the deadline when the numbers are manageable. This could take as much as 5-10 years but at least it would give holders ample time to decide whether they wish to convert now or wait until later.

9.27 **On balance:** the 'sunset' option seems to carry the benefits of Options B and C and mitigate some of the costs; however, it still involves imposing a transition deadline on the community, and there are complexities around the implementation of the transition deadline that must be considered.

Consultation Question 17

Which option do you prefer for accepting licences issued under a legacy system?

- Option A: changes apply to new licence issues only
- Option B: immediate mandatory conversion
- Option C: 'deemed valid' or
- Option D: 'sunset': 'deemed valid' for open transition period followed by mandatory conversion
- Other option we have not considered here: _____
- Reason for my view (if any): _____;
- No view/don't know

APPENDIX A

Abbreviations

Abbreviations	
ANO	Air Navigation Order 2016
AOC	Air Operator's Certificate
BPL	Balloon Private Licence
CPB	Commercial Passenger Ballooning
DBO	Declared Balloon Operator
EASA	European Aviation Safety Agency
FCL	Flight Crew Licensing
GA	General Aviation
ICAO	International Civil Aviation Organisation
IR	Instrument Rating
IR(R)	Instrument Rating (Restricted): a national rating that can be added to the PPL(A) allowing the holder to exercise privileges in Instrument Meteorological Conditions (IMC) outside of controlled airspace. Formerly known as the IMC Rating.
LAPL	Light Aircraft Pilot Licence
NPPL	National Private Pilot Licence: can be issued for an Aeroplane (A) or Helicopter (H)
PPL	Private Pilot Licence: can be issued for an Aeroplane (A), Helicopter (H), Balloons & Airships (BA) or Gyroplane (G)
PPL(L)	Private Pilot Licence (Light): the suggested title for the sub-ICAO variation of the PPL as proposed in Chapter 4 of this consultation paper.
SARPs	Standards & Recommended Practices (ICAO Annexes)
SEP	Single Engine Piston: an aeroplane class rating that could be added to a PPL. Can be issued as a Landplane (L) or Seaplane (S) rating, and can be added with additional control ratings such as retractable undercarriage, variable pitch propeller, Electronic Flight Information System, etc.
SLMG	Self-Launching Motor Glider
SPL	Sailplane Pilot Licence
SSEA	Simple Single-Engine Aeroplane
TMG	Touring Motor Glider
VFR	Visual Flight Rules